



August 15, 2019

Regional Freedom of Information Officer  
U.S. EPA, Region 1 (OARM01-6)  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912  
(617) 918-1102

**Re: Freedom of Information Act Request**

Dear Sir or Madam:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. 552 and 42 U.S.C. Section 9604(e)(7)(A),<sup>1</sup> I am requesting copies and/or access to records held at EPA's Region 1 office.

Records of interest include documents created, compiled, and submitted to the EPA under regulatory programs such as the Resource Conservation and Recovery Act (RCRA), the Toxic Substances Control Act (TSCA), Clean Air Act (CAA), the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and the Emergency Planning and Community Right-to-Know Act (EPCRA).

Specifically, I am requesting release of a number of specific documents and types of documents held at Region 1 concerning the operations of Cranston Print Works in Cranston, Rhode Island. Below, I have included information on the site occupant's name, address(es), any available facility ID numbers, and the types of documents requested. The following sections are arranged according to specific EPA regulatory programs.

*AIR Requested Documents*

We understand that Cranston Print Works at 1381 Cranston Street, Cranston, RI operated under the regulation of the Clean Air Act, possibly with the following facility ID: RI0000004400700006.

We therefore request the following documents related to this facility:

- Air permit registration and application documents
- Inspection files
- Correspondence for 1976 and earlier

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<sup>1</sup> The relevant statutory text provides that: "Any records, reports, or information obtained from any person under this section (including records, reports, or information obtained by representatives of the President) shall be available to the public, [except for trade secrecy claims]. Trade secrecy claims are restricted by section 104(e)(7)(F).

#### RCRA Requested Documents

We understand that hazardous waste generated by Cranston Print Works, Bercen Inc., and Bercen Universal Engravers (Div. of CPW Co.) at 1381 Cranston Street, Cranston, RI was regulated under the Resource Conservation and Recovery Act (RCRA) and was assigned the following RCRA facility ID: RID001438480.

We request the following materials relating to this facility produced by the company as required by RCRA:

- RCRA Notification
- Part A application (Form 8700-12)
- Related correspondence for the period 1984 and earlier
- Work plans and closure documentation related to contamination processes and chemical releases
- Biennial hazardous waste reports from 1981 to 1985

#### TSCA Inventory Requested Documents

We understand that, under the chemical inventory provisions of the Toxic Substances Control Act (TSCA), Bercen North at 1381 Cranston Street, Cranston, RI identified certain chemicals used at these sites. We therefore request the following documents related to these facilities produced as required by TSCA:

- 1986 Reporting Year Data

#### TSCA/FIFRA Requested Documents

We also understand that Cranston Print Works Co. and Bercen, Inc., at 1381 Cranston Street, Cranston, RI, may have been subject to a TSCA enforcement action in the FIFRA/TSCA Tracking System with the ID number HQ-1995-0030. We therefore request documentation of any notifications, inspections, and enforcement actions and other documents, particularly those related to chemicals and processes, arising from this enforcement action. This enforcement action apparently concerned alleged violations of TSCA inventory rules.

#### TSCA PCB Regulations

We understand that, under the PCB regulations adopted pursuant to section 6 of the Toxic Substances Control Act, that PCB waste materials may have been used or remediated at Cranston Print Works, Bercen Inc., and Bercen Universal Engravers (Div. of CPW Co.) at 1381, 1388, and 1425 Cranston Street, Cranston, RI, respectively. We therefore request the following documents related to PCBs and these installations:

- Documentation of any PCB related notifications, inspections, and enforcement actions involving these locations or parties, including documentation regarding the following PCB activities:
  - 1996 waste manifest for 20 kgs of PCBs
  - 1994 waste manifest for 1348 lbs of PCBs (CR01-MA02)

- 1992 waste manifest for 20 kgs of PCBs

#### TRI Requested Documents

We understand that Cranston Print Works at 1381 Cranston Street, Cranston, RI was required to file an annual report with the EPA's Toxics Release Inventory (TRI) Program to document the release of certain chemicals. The company was assigned the following TRI facility ID: 02920CRNST1381C.

We also understand that Bercen, Inc. at 1381 Cranston Street, Cranston, RI was required to file an annual report with the EPA's Toxics Release Inventory (TRI) Program to document the release of certain chemicals. The company was assigned the following TRI facility ID: 02920BRCNN1318C.

We therefore request the annual report / submittal (also known as "Form R") filed by both companies for the 1987 reporting year.

#### Brownfields Requested Documents

We understand that the Cranston Print Works Printers Row Development was designated a Federal Brownfields site with the following facility ID number: 102762. We therefore request work plans and closure documentation, particularly documents focusing on processes causing contamination and chemicals releases, related to the Brownfields program

#### Request Information

History Associates requests the release of the above materials. If this is not possible, we request information as to why, as we understand that these collections are publically accessible under statutory regulations.

History Associates agrees to pay all reasonable and standard processing fees authorized by 5 U.S.C. 552(a)(4)(A) and the applicable regulations up to \$250. Should the fees exceed this amount, please call me with an estimate of the total costs in order that specific expenditures beyond \$250 can be authorized.

Should you have any questions or concerns regarding this request, please contact me at (301) 279-9697 or via email at [HBergen@historyassociates.com](mailto:HBergen@historyassociates.com).

Sincerely,

Hilary Bergen